

Hi Annie,

Below is the list of anticipated questions I will have for you in this case:

ANNIE DOOKHAN

COULD YOU PLEASE STATE AND SPELL YOUR FULL NAME

HOW ARE YOU CURRENTLY EMPLOYED

HOW LONG HAVE YOU BEEN EMPLOYED WITH THE STATE DRUG
LABORATORY

WHAT ARE YOUR DUTIES AND RESPONSIBILITIES AS A CHEMIST AT THE
MASSACHUSETTS STATE DRUG LABORATORY

WHAT FORMAL EDUCATION HAVE YOU RECEIVED

APPROXIMATELY HOW MANY TIMES HAVE YOU HAD OCCASION TO TEST
FOR A CONTROLLED SUBSTANCE

IN PARTICULAR HAVE YOU RECEIVED TRAINING AND LEARNED HOW TO
TEST FOR THE PRESENCE OF COCAINE/HEROIN

CAN YOU DESCRIBE THE TEST(S) TO DETERMINE WHETHER A SUBSTANCE
CONTAINS COCAINE/HEROIN

IF COCAINE/HEROIN IS PRESENT WHAT HAPPENS DURING THAT TEST
(THOSE TESTS)

DOES THIS TEST HAVE A NAME/DO THESE TESTS HAVE NAMES

DOES YOUR LABORATORY HAVE PROTOCOLS IN PLACE FOR RECEIVING
SUBSTANCES FROM POLICE AGENCIES FOR TESTING

CAN YOU EXPLAIN IN GENERAL HOW YOU RECEIVE SUBSTANCES FROM
POLICE AGENCIES

ONCE THE SUBSTANCE(S) HAVE BEEN LOGGED IN ARE THEY ASSIGNED TO
A PARTICULAR CHEMIST FOR TESTING AND ANALYSIS

HOW DO YOU RECEIVE CASE ASSIGNMENTS FOR TESTING AND ANALYSIS

WHAT HAPPENS WHEN YOU ARE ASSIGNED A CASE

HOW DO YOU KEEP TRACK OF THE CASES YOU ARE ASSIGNED

DID YOU HAVE AN OPPORTUNITY TO ANALYZE SOME SUBSTANCES IN THIS CASE

ON JANUARY 8, 2008 DID YOU RECEIVE THREE ITEMS FOR ANALYSIS

DID YOU RECEIVE SOME INFORMATION WITH THOSE THREE ITEMS

WHAT INFORMATION DID YOU RECEIVE WITH THOSE THREE ITEMS ON JANUARY 8, 2008

DID YOUR LABORATORY ASSIGN ANALYSIS NUMBERS TO THOSE ITEMS

WHAT WERE THE ANALYSIS NUMBERS ASSIGNED TO THE CASE

CAN YOU TELL US STEP BY STEP WHAT YOU DID WITH THOSE SUBSTANCES

ARE THE STEPS YOU JUST DESCRIBED THE NORMAL POLICIES AND PROCEDURES FOR TESTING AN UNKNOWN SUBSTANCE

WERE YOU ABLE TO CONCLUDE TO A REASONABLE DEGREE OF SCIENTIFIC CERTAINTY WHAT SUBSTANCE WAS CONTAINED IN ITEM

WHAT TEST(S) WERE USED TO DETERMINE THAT

HOW MUCH DID ITEM WEIGH

DID YOU GENERATE A REPORT THAT DOCUMENTED YOUR OBSERVATIONS AND ANALYSIS

I AM PLACING A DOCUMENT BEFORE YOU DO YOU RECOGNIZE THAT DOCUMENT

DID YOU GENERATE THAT DOCUMENT

DID YOU INCLUDE THE INFORMATION THAT YOU RECEIVED WITH THIS SUBSTANCE ON THIS DOCUMENT

IS THAT YOUR SIGNATURE ON THE DOCUMENT

DOES THIS DOCUMENT RELATE TO THESE DRUGS

HOW DO YOU KNOW THAT THESE DRUGS RELATE TO THIS DRUG CERTIFICATE

WERE YOU ABLE TO CONCLUDE TO A REASONABLE DEGREE OF
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ONCE YOU HAVE COMPLETED YOUR ANALYSIS OF DRUG EVIDENCE
WHAT ARE THE PROCEDURES AT THE STATE DRUG LABORATORY

WERE THOSE PROCEDURES FOLLOWED IN THIS CASE

Let me know if these seem to cover everything and if you have any preferences on
phrasing. Thank you again for your help on this.

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